



# TRID COC REDISCLOSURE GUIDE

## Fee Tolerances

### **0% Tolerances: Must be disclosed upfront!**

- Origination charges
- Appraisal Fee
- Credit Report Fee
- Condo Review Fee
- Final Inspection Fee (New Builds)
- State/County-Specific Transfer Tax
- Mortgage Insurance: FHA MIP and VAFF
  - Check LTV and Government charts

### **10% Tolerance: (1200 section)**

- Government Recording Fee
- State-specific (Georgia GRMA Fee)

### **Allowed to Change (No Tolerance Restrictions):**

- Termite, HOA, Home Warranty, Survey or ILR Fees (1300 section)
- Title Services, Notary Fees (1100 section)

### **\*Discount Points: (Itemization #802e)**

Can only be increased or added with relevant lock changes (lock, extension, rate buydown, etc.)

**This cannot be added without valid justification from the lock desk.**

*PCR Note: If discount point fee is added or increased at time of doc request with a valid reason, we will need a reflect the increase as a cure to pass Mavent (work around), and then it can be locked down as a valid change (no cure) for the Funder's Final CD/COC.*

## Timing & Waiting Periods (Do not include Sundays or Federal Holidays)

### **7 Days**

- Initial LE Disclosure
- New Borrower added
- New Co-mortgagor added

### **3 Days**

- Initial CD
- Revised CD
- If O/O Refi: CD with Non-Borr Title-Only

### **No waiting period**

- Final CD

### **Lock Re-Disclosure: Must issue within 3 days after the lock date!**

If applicable, must include *state-specific* lock agreements: **CA, DC, FL, IL, MA, MI, MN, MT, NJ, NM, OR, PA, TN, VA, WA, and WY**

### **Do NOT Issue:**

- Multiple LE's on the same day
- LE and CD on the same day
- LE after CD has already been sent

## Re-Disclosure Requirements

### **Major changes - Revised LE and COC**

- Initial Lock
- Loan type (Conv, FHA, VA, USDA)
- Amortization type (Fixed, ARM)
- APR increase >.125% (fixed) or >.25% (ARM)
- Pre-payment penalty
- Loan Purpose (Refinance to Purchase) – Construction to Perm loans ONLY!
- Adding borrower or co-mortgagor
  - ❖ 7 days for earliest closing date

## **Other changes – COC for Revised LE, Initial CD, Revised CD, Final CD**

### **Allowable so long as APR is within tolerance and within a timely manner**

- \*Discount Points with valid reason
- Lender Credit reduced or removed (due to relock)
- Applying a lender cure for 0% or 10% Tolerance Violations
- Sales Price, Appraised Value, Loan Amount
- Interest Rate & Loan Term
- Escrow Waiver or Change in prepaids
- Subordination fees (Borrower POC)
- Mortgage Insurance corrections
- Monthly, Upfront, Financed or Paid in Cash
- **Tolerance Fees & Finance Charges: [Best Practice: within 3 days of change/update]**
  - \*Discount Points with valid reason
  - Broker Admin Fee (Line 1310 or below)
  - RE Commissions (Section 700)
  - Additional Appraisal Services (UW requested)
  - Final Inspections (Existing homes with repairs)
  - Condo Review Fees (Property Type errors)
  - Doc Prep - Trust, POA, Escrow Holdbacks
  - Title Services, HOA, Contract Related Fees
  - Special Program / DPA fees
  - Manufactured Home Fees (Engineer/Foundation Cert, IBTS HUD Cert/Label)
  - Upfront Fees paid by VIP and collected for reimbursement
  - Subordination Fees, HOA Insurance Cert Fees, etc.
    - X marks the spot for APR box, since payee reflects “VIP Paid to xxx”

## **Major changes - Revised CD and COC**

### **Do not issue Revised CD until we have the signed Initial CD and 3-day wait period has ended**

- Loan type (Conv, FHA, VA, USDA)
- Amortization type (Fixed, ARM)
- APR increase >.125% (fixed) or >.25% (ARM)
- Pre-payment penalty
- Adding Non-Borrowing as Title Only\*\* (**Rescindable loans O/O Refinances**)
- Loan Purpose (Refinance to Purchase) – Construction to Perm loans ONLY!

## **Misc. Disclosure Requirements – 3 Day Waiting Periods**

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### Flood Loans

- Flood Notices: Page 2 of Flood Cert

### Appraisal Services:

- A.I.R. Cert (processor-signed and secure delivery) -OR- A.I.R. Disclosure (borrower-signed)
- A.I.R. Waiver: Form must be signed and dated at least three days prior to closing.
  - Must also include either the A.I.R. disclosure or A.I.R. Cert for our records (no additional wait since the waiver signature/date serves as our 3 day wait)